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*Counsel for the Multi-State  
Governmental Entities Group*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-FIRST MONTHLY FEE STATEMENT OF  
CAPLIN & DRYSDALE, CHARTERED, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES WITH  
RESPECT TO SERVICES RENDERED AS COUNSEL TO THE  
MULTI-STATE GOVERNMENTAL ENTITIES GROUP FOR THE PERIOD  
COMMENCING MARCH 1, 2022, THROUGH MARCH 31, 2022**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters are located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

**Name of Applicant:** Caplin & Drysdale, Chartered

**Authorized to Provide Professional Services to:** Multi-State Governmental Entities Group

**Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:** April 22, 2021 [Docket No. 2695]

**Period for which Compensation and Reimbursement are sought:** March 1, 2022, through March 31, 2022

**Amount of Compensation sought as actual, reasonable, and necessary:** \$359,584.50

**Amount of Expense Reimbursement sought as actual, reasonable, and necessary:** \$5,062.58

**Total compensation requested in this statement:** \$287,667.60 (80% of \$359,584.50)

**Total expenses requested in this statement:** \$5,062.58

**Total compensation and expenses requested in this statement:** \$292,730.18

**This is a:**   X   monthly        interim        final application.

Pursuant to the *Order Authorizing the Debtors to Enter Into Term Sheet With and Pay Certain Fees and Expenses of the Multi-State Governmental Entities Group* [Docket No. 2695] (the “**MSGE Group Fee Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**”), the law firm of Caplin & Drysdale, Chartered (“**Caplin & Drysdale**”), hereby submits this Thirty-First Monthly Fee Statement (the “**Fee Statement**”) for allowance of compensation for professional legal services rendered as counsel to the Multi-State Governmental Entities Group (“**MSGE Group**”) in the above-captioned case, and reimbursement of actual and necessary expenses incurred, for the period commencing March 1, 2022, through March 31, 2022 (the “**Fee Period**”).

**Itemization of Services Rendered and Disbursements Incurred**

Attached hereto as **Exhibit A**, is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Fee Period with respect to each of the project categories Caplin & Drysdale established in accordance with its internal billing procedures. As reflected in **Exhibit A**, Caplin & Drysdale rendered 550.7 hours of professional services during the Fee Period, resulting in fees totaling \$359,584.50. Pursuant to this Fee Statement, Caplin & Drysdale seeks reimbursement for 80% of such fees, totaling \$287,667.60.

Attached hereto as **Exhibit B** is a chart of Caplin & Drysdale's professionals and paraprofessionals who rendered services to the MSGE Group in connection with these chapter 11 cases during the Fee Period. This chart includes the title and standard hourly rate for each attorney and paraprofessional, as well as the aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is \$425. The blended hourly rate of all paraprofessionals is \$769.04. A copy of the computer-generated time entries reflecting all time recorded, organized in project billing categories by Caplin & Drysdale is attached hereto as **Exhibit D**.

Attached hereto as **Exhibit C** is a chart of necessary and out-of-pocket expenses incurred by Caplin & Drysdale in the amount of \$5,062.58 in connection with providing professional services during the Fee Period and a copy of the computer-generated list of expenses.

**Notice**

Caplin & Drysdale will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to the Notice Parties (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Caplin & Drysdale an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: May 6, 2022

Respectfully submitted,

/s/ Kevin C. Maclay

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Todd E. Phillips, Esq.

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*Counsel for the Multi-State*

*Governmental Entities Group*

# **EXHIBIT A**

**SUMMARY OF SERVICES BY CATEGORY**

**MARCH 1, 2022, THROUGH MARCH 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
.04	Case Administration	2.8	\$1,206.00
.07	Fee Applications-Self	12.1	\$6,073.50
.11	Plan & Disclosure Statement	519.1	\$344,334.50
.15	MSGGE Group Meetings/Conferences	8.4	\$4,609.00
.17	Docket Review & File Maintenance	8.3	\$3,361.50
<b>TOTAL</b>		<b>550.7</b>	<b>\$359,584.50</b>

# **EXHIBIT B**

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL**

**MARCH 1, 2022, THROUGH MARCH 31, 2022**

<b>Name of Professional</b>	<b>Position/Year Admitted/Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,175.00	48.5	\$56,987.50
Todd E. Phillips	Member / 2005 / Bankruptcy	\$915.00	4.5	\$4,117.50
James P. Wehner	Member / 1995 / Bankruptcy	\$975.00	2.7	\$2,632.50
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$975.00	133.0	\$129,675.00
Nathaniel R. Miller	Associate / 2016 / Bankruptcy	\$525.00	2.0	\$1,050.00
Lucas H. Self	Associate / 2016 / Bankruptcy	\$525.00	126.0	\$66,150.00
Allegra N. Kauffman	Associate / 2019 / Bankruptcy	\$425.00	41.8	\$17,765.00
George M. O'Connor	Associate / 2018 / Bankruptcy	\$465.00	56.1	\$26,086.50
Cecilia Guerrero	Paralegal / N/A / Bankruptcy	\$405.00	9.8	\$3,969.00
Jessica A. Giglio	Paralegal / N/A / Bankruptcy	\$405.00	126.3	\$51,151.50
<b>TOTAL</b>			<b>550.7</b>	<b>\$359,584.50</b>



# EXHIBIT C

**SUMMARY OF EXPENSES**

**MARCH 1, 2022, THROUGH MARCH 31, 2022**

<b>Category</b>	<b>Amount</b>
Court Reporter Transcript Services	\$255.60
Database Research	\$4,445.96
Outside Duplication	\$311.39
Postage	\$49.63
<b>TOTAL</b>	<b>\$5,062.58</b>

# **EXHIBIT D**



One Thomas Circle NW, Suite 1100  
Washington, DC 20005  
Federal Tax I.D. No.: 52-1226629

Telephone: (202) 862-5000

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Fax: (202) 429-3301

Multi-State Governmental Entities Group

Invoice #: 340939

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through March 31, 2022

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Total Services	\$359,584.50
Total Disbursements	\$5,062.58
Total Current Charges	\$364,647.08

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**Remittance Advice**

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

**Check Payable To:**

Caplin & Drysdale, Chartered  
Attn: Accounts Receivable  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

**Wire Transfer:**

Receiving Bank: Bank of America  
ABA Wire Routing Number: 026009593  
ABA ACH Routing Number: 054001204  
Swift Code: BOFAUS3N  
Beneficiary: Caplin & Drysdale, Chartered  
Account Number: 001920814809

**Credit Card:**

We accept American Express. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.



One Thomas Circle NW, Suite 1100  
Washington, DC 20005  
Federal Tax I.D. No.: 52-1226629

Telephone: (202) 862-5000

[www.capdale.com](http://www.capdale.com)

Fax: (202) 429-3301

Multi-State Governmental Entities Group

April 29, 2022

Invoice #: 340939

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through March 31, 2022

#### SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
<b>.04 Case Administration &amp; Calendar Control</b>					
3/2/2022	LHS1	Confer w/ Clerk's office re notices of appearance (.1); review and revise notices re same (.4); communicate w/ KCM, JAL, and JAG re same (.1).	0.6	\$525.00	\$315.00
3/3/2022	JAG	Review docket and update calendar.	0.3	\$405.00	\$121.50
3/8/2022	JAG	Attorney hearing registrations (.2); communications w/ KCM, JAL, GMO and LHS re same (.1).	0.3	\$405.00	\$121.50
3/14/2022	JAG	Confer w/ Clerk's office re Second Circuit filings (.7); prepare, file and effect service of notices of appearance (.9).	1.6	\$405.00	\$648.00
<b>Total</b>			<b>2.80</b>		<b>\$1,206.00</b>
<b>.07 Fee Applications-Self</b>					
3/8/2022	TEP	Communicate w/ CG re monthly fee application (.1); confer w/ Accounting re same (.1).	0.2	\$915.00	\$183.00
3/9/2022	TEP	Communicate w/ CG re monthly fee application.	0.1	\$915.00	\$91.50
3/9/2022	TEP	Communicate w/ CG and KCM re monthly fee application.	0.3	\$915.00	\$274.50
3/13/2022	TEP	Communicate w/ CG re January and February monthly fee applications.	0.2	\$915.00	\$183.00
3/15/2022	TEP	Communicate w/ KCM re monthly fee applications.	0.1	\$915.00	\$91.50
3/17/2022	TEP	Communications w/ CG re monthly fee applications.	0.1	\$915.00	\$91.50
3/18/2022	TEP	Review and edit monthly fee application.	0.9	\$915.00	\$823.50
3/19/2022	TEP	Review and edit monthly fee application.	0.4	\$915.00	\$366.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.07 Fee Applications-Self</b>					
3/22/2022	CG	Review and revise fee applications.	9.8	\$405.00	\$3,969.00
<b>Total</b>			<b>12.10</b>		<b>\$6,073.50</b>
<b>.11 Plan &amp; Disclosure Statement</b>					
3/1/2022	JAL	Review and analyze materials re Second Circuit reply brief.	4.4	\$975.00	\$4,290.00
3/2/2022	JAL	Review and analyze draft term sheet.	1.3	\$975.00	\$1,267.50
3/2/2022	KCM	Review/analyze settlement term sheet and related materials.	0.6	\$1,175.00	\$705.00
3/2/2022	KCM	Communicate w/ TEP, JAL and NRM re settlement term sheet.	0.1	\$1,175.00	\$117.50
3/2/2022	TEP	Review draft settlement stipulation.	0.5	\$915.00	\$457.50
3/2/2022	GMO	Review and analyze Sackler term sheet (3.3); confer w/ JAG re draft filing (.2).	3.5	\$465.00	\$1,627.50
3/2/2022	NRM	Review draft term sheet (.4); communications w/ TEP re same (.2).	0.6	\$525.00	\$315.00
3/2/2022	JAG	Review and analyze docket and relevant entries re settlement term sheet (1.4); confer w/ GMO re same (.2).	1.6	\$405.00	\$648.00
3/3/2022	LHS1	Analyze settlement term sheet (1.8); review objection re same (1.3).	3.1	\$525.00	\$1,627.50
3/4/2022	JAL	Review and analyze Debtors' term sheet motion and related documents (2.3); attend status conference (.7); review and analyze objections re term sheet motion (.8).	3.8	\$975.00	\$3,705.00
3/4/2022	KCM	Review/analyze materials re settlement and related issues and plan/prepare next steps.	3.7	\$1,175.00	\$4,347.50
3/4/2022	KCM	Attend status conference.	0.7	\$1,175.00	\$822.50
3/4/2022	TEP	Review JAG communication re joint appendix.	0.1	\$915.00	\$91.50
3/4/2022	GMO	Review motion to approve settlement term sheet (1.7); research re same (3.7); prepare for status conference (.3); attend status conference (.7); research re settlement term sheet and related documents (1.1).	7.5	\$465.00	\$3,487.50
3/4/2022	LHS1	Analyze term sheet (1.1); review related materials (.8).	1.9	\$525.00	\$997.50
3/5/2022	JAL	Review and analyze email from GMO re Debtors' motion to approve settlement term sheet.	0.4	\$975.00	\$390.00
3/5/2022	GMO	Research re settlement term sheet (3.8); draft reply re same (1.6).	5.4	\$465.00	\$2,511.00
3/6/2022	GMO	Research re settlement term sheet issues (1.6); draft response re Debtors' motion to approve term sheet (6.1).	7.7	\$465.00	\$3,580.50

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/7/2022	JAL	Review and revise draft statement re proposed settlement term sheet (1.2); review and revise draft response to proposed settlement term sheet (2.4); teleconference w/ KCM re developments and next steps (.6).	4.2	\$975.00	\$4,095.00
3/7/2022	JAL	Review and analyze objections to motion to approve proposed settlement term sheet.	0.2	\$975.00	\$195.00
3/7/2022	KCM	Review/analyze filings and materials re settlement issues and plan/prepare next steps.	5.1	\$1,175.00	\$5,992.50
3/7/2022	KCM	Teleconference w/ JAL re case status and next steps.	0.6	\$1,175.00	\$705.00
3/7/2022	GMO	Revise draft filing re settlement term sheet (3.4); review objections to motion to approve settlement term sheet (.5); draft memo re objections (.4); communications w/ JAG re same (.1); communications w/ JAL re draft filing (.2).	4.6	\$465.00	\$2,139.00
3/7/2022	LHS1	Review and analyze term sheet objections.	3.9	\$525.00	\$2,047.50
3/7/2022	JAG	Fact research re motion to approve settlement term sheet (2.6); communications w/ GMO re same (.2); review, revise and cite check statement re motion to approve settlement term sheet (2.7); communications w/ KCM, TEP, JAL and GMO re same (.2).	5.7	\$405.00	\$2,308.50
3/8/2022	JAL	Review and revise draft response re settlement term sheet (1.0); review correspondence re same (.2); communicate w/ KCM, TEP, and GMO re same (.3); communicate w/ JAG re same (.2); review and analyze materials re response to term sheet motion (3.3); review and analyze objections re Debtors' motion to approve settlement term sheet (2.1); confer w/ KCM re same (.4).	7.5	\$975.00	\$7,312.50
3/8/2022	KCM	Teleconferences w/ TEP re case status.	0.4	\$1,175.00	\$470.00
3/8/2022	KCM	Review/edit settlement response (3.3); review/analyze related briefs and materials and plan/prepare next steps (3.9).	7.2	\$1,175.00	\$8,460.00
3/8/2022	KCM	Plan/prepare for hearing and review/analyze related communications and materials.	2.2	\$1,175.00	\$2,585.00
3/8/2022	KCM	Teleconference w/ JAL re settlement response.	0.4	\$1,175.00	\$470.00
3/8/2022	TEP	Conferences w/ KCM re case status.	0.4	\$915.00	\$366.00
3/8/2022	JAG	Revise, cite check, and effect filing of statement in support of term sheet and service of same (3.2); confer w/ KCM re same (.3); communications w/ JAL re same (.2); fact research re same (1.3); hearing preparation (.9); communications re same (.2); fact research re Second Circuit appeal (.9); communications w/ LHS re same (.2).	7.2	\$405.00	\$2,916.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/9/2022	JAL	Review and analyze materials re prep for hearing (2.6); attend hearing (4.5).	7.1	\$975.00	\$6,922.50
3/9/2022	KCM	Plan/prepare for hearing.	0.6	\$1,175.00	\$705.00
3/9/2022	KCM	Attend hearing.	4.5	\$1,175.00	\$5,287.50
3/9/2022	KCM	Plan/prepare next steps and review/analyze related materials re settlement, plan and appeal issues.	2.8	\$1,175.00	\$3,290.00
3/9/2022	GMO	Prepare for hearing (2.3); attend hearing (4.5).	6.8	\$465.00	\$3,162.00
3/9/2022	LHS1	Attend hearing (3.6) (partial); review cases cited in appellants' briefs (3.1).	6.7	\$525.00	\$3,517.50
3/10/2022	JAL	Review draft motion re preliminary injunction (.2); correspond w/ KCM and LHS re same (.2).	0.4	\$975.00	\$390.00
3/10/2022	KCM	Review/analyze materials re case status and appeal issues and plan/prepare next steps.	2.1	\$1,175.00	\$2,467.50
3/10/2022	GMO	Attend hearing (2.9); draft memo re hearing and related issues (.7).	3.6	\$465.00	\$1,674.00
3/10/2022	LHS1	Confer w/ K. Houston re joint appendix (.2); review joint appendix cites (.4).	0.6	\$525.00	\$315.00
3/11/2022	JAL	Teleconference w/ LHS re Second Circuit briefing (.3); communicate w/ JAG re same (.1).	0.4	\$975.00	\$390.00
3/11/2022	KCM	Teleconference w/ TEP re filing issue.	0.1	\$1,175.00	\$117.50
3/11/2022	TEP	Confer w/ Second Circuit clerk re filing (.1); communicate w/ KCM, JAL, LHS, and CG re same (.1); confer w/ KCM re same (.1).	0.3	\$915.00	\$274.50
3/11/2022	LHS1	Confer w/ JAL re appellate brief (.3); review related briefing (.7).	1.0	\$525.00	\$525.00
3/12/2022	JAL	Review and analyze Second Circuit appellee briefs.	0.7	\$975.00	\$682.50
3/12/2022	LHS1	Review U.S. Trustee's Brief (2.3); review Canadian appellant's brief (1.8); review cases cited in briefs (1.6).	5.7	\$525.00	\$2,992.50
3/12/2022	JAG	Prepare material re Second Circuit reply (.9); communications w/ KCM, JAL and LHS re same (.2).	1.1	\$405.00	\$445.50
3/13/2022	JAL	Review and analyze Second Circuit appellee briefs and related materials.	3.3	\$975.00	\$3,217.50
3/13/2022	LHS1	Review cases cited in briefs (2.6); draft outline re response (3.1).	5.7	\$525.00	\$2,992.50
3/14/2022	JAL	Review and analyze appellee briefs and related materials.	8.7	\$975.00	\$8,482.50
3/14/2022	KCM	Review/analyze appellate materials and plan/prepare next steps.	1.3	\$1,175.00	\$1,527.50
3/14/2022	TEP	Review amicus and other parties in interest communications re appeal briefing.	0.2	\$915.00	\$183.00



**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/14/2022	GMO	Revise brief in response to Debtors' motion to approve settlement term sheet (2.9); research re settlement issues (.4); review draft appellate materials (.8).	4.1	\$465.00	\$1,906.50
3/14/2022	LHS1	Draft outline re reply brief (3.1); review cases cited in response briefs (3.8).	6.9	\$525.00	\$3,622.50
3/15/2022	JAL	Teleconference w/ LHS re Second Circuit reply brief (.9); review and analyze materials re same (4.9).	5.8	\$975.00	\$5,655.00
3/15/2022	ANK	Review and analyze materials re reply brief (3.1); research bar date orders re same (2.1).	5.2	\$425.00	\$2,210.00
3/15/2022	LHS1	Draft portions of reply brief (3.6); review cases cited re same (2.4); confer w/ JAL re same (.9).	6.9	\$525.00	\$3,622.50
3/16/2022	KCM	Review/analyze materials re appeal and case issues and plan/prepare next steps.	2.4	\$1,175.00	\$2,820.00
3/16/2022	ANK	Review and analyze bar date orders re preparation of reply brief.	7.1	\$425.00	\$3,017.50
3/16/2022	LHS1	Draft insert re classification issue (3.2); draft section of reply brief re jurisdiction issue (2.6); research cases re same (3.3).	9.1	\$525.00	\$4,777.50
3/17/2022	JAL	Review and analyze materials re reply brief.	2.8	\$975.00	\$2,730.00
3/17/2022	LHS1	Research issues re tribal sovereignty (7.8); draft section of brief re same (1.1).	8.9	\$525.00	\$4,672.50
3/18/2022	JAL	Draft and revise Second Circuit reply brief.	4.6	\$975.00	\$4,485.00
3/18/2022	ANK	Review and analyze bar date orders re preparation of reply brief.	6.3	\$425.00	\$2,677.50
3/18/2022	LHS1	Review and revise sections of reply brief.	1.4	\$525.00	\$735.00
3/19/2022	JAL	Review and revise Second Circuit reply brief.	6.8	\$975.00	\$6,630.00
3/19/2022	ANK	Review and analyze bar date orders re reply brief.	2.9	\$425.00	\$1,232.50
3/19/2022	LHS1	Edit reply brief (2.7); research sovereign immunity (2.5); review and revise same (1.2); incorporate additional case cites (1.6); incorporate citations to special appendix (1.9).	9.9	\$525.00	\$5,197.50
3/20/2022	JAL	Review and revise Second Circuit reply brief.	5.7	\$975.00	\$5,557.50
3/20/2022	ANK	Research and analyze fraudulent claims issues re reply brief.	3.2	\$425.00	\$1,360.00
3/20/2022	LHS1	Edit reply brief (.9); research additional cases re same (1.4).	2.3	\$525.00	\$1,207.50
3/21/2022	JAL	Review and revise Second Circuit reply brief (6.6); review and revise draft motion to file oversize reply brief and accompanying documents (1.7); teleconference w/ KCM re reply brief (.2); communicate w/ JAG re same (.2); communicate w/ LHS re same (.1).	8.8	\$975.00	\$8,580.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/21/2022	KCM	Teleconference w/ JAL re appeal issues.	0.2	\$1,175.00	\$235.00
3/21/2022	ANK	Research and analyze fraudulent claims issues re reply brief.	8.4	\$425.00	\$3,570.00
3/21/2022	LHS1	Review joint appendix rules (.4); review and analyze potential items re joint appendix (1.0); research case law re reply brief (2.6); correspond w/ JAL re same (.5); communicate w/ ANK re research (.1); research additional cases re same (2.2).	6.8	\$525.00	\$3,570.00
3/21/2022	JAG	Fact research re Second Circuit reply brief (2.4); communications w/ LHS re same (.2).	2.6	\$405.00	\$1,053.00
3/22/2022	JAL	Draft and revise Second Circuit reply brief.	12.9	\$975.00	\$12,577.50
3/22/2022	TEP	Communicate w/ JAL and LHS re UCC appeal issue.	0.1	\$915.00	\$91.50
3/22/2022	ANK	Research and analyze dischargeability issues re drafting reply brief.	8.7	\$425.00	\$3,697.50
3/22/2022	LHS1	Review appeal brief (.9); research case law re same (2.1).	3.0	\$525.00	\$1,575.00
3/22/2022	JAG	Review, cite check, file, and effect service of motion to file oversized brief (1.9); communications w/ JAL and LHS re same (.3).	2.2	\$405.00	\$891.00
3/22/2022	JAG	Review, edit and cite check Second Circuit reply brief.	5.6	\$405.00	\$2,268.00
3/23/2022	JAL	Attend hearing (1.1); review and revise reply brief (4.1); review and analyze draft reply briefs of other appellants (4.3); correspondence w/ LHS re record designations and joint appendix (.6); communicate w/ KCM re reply brief and next steps (.2); teleconference w/ JAG re same (.2); teleconference w/ KCM, JPW (partial), and JAG (partial) re reply brief and next steps (1.4).	11.9	\$975.00	\$11,602.50
3/23/2022	JPW	Review draft reply brief (1.5); teleconference KCM re reply brief (.2); teleconference KCM, JAL, JAG re same (partial) (1.0).	2.7	\$975.00	\$2,632.50
3/23/2022	KCM	Review/edit appeal brief and review/analyze related materials.	6.7	\$1,175.00	\$7,872.50
3/23/2022	KCM	Teleconference w/ JPW re reply.	0.2	\$1,175.00	\$235.00
3/23/2022	KCM	Teleconferences w/ JAL, JAG (partial), and JPW (partial) re appeal brief.	1.4	\$1,175.00	\$1,645.00
3/23/2022	TEP	Review JAG communication re appeal argument.	0.1	\$915.00	\$91.50
3/23/2022	GMO	Prepare for hearing (.2); attend hearing (partial) (.6); draft summary re same (.2); research re late claim issues and related filings (.5); review appellate filings (1.9).	3.4	\$465.00	\$1,581.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/23/2022	LHS1	Confer w/ K. Houston re joint appendix (.2); review materials for inclusion in joint appendix (2.4); review and edit reply brief (3.6); confer w/ M. Quinn re same (.2); communicate w/ JAL and KCM re same (.1); review draft reply briefs (1.8).	8.3	\$525.00	\$4,357.50
3/23/2022	JAG	Review, edit and cite check Second Circuit reply brief (12.2); confer w/ KCM, JAL and JPW re same (partial) (1.1); confer w/ JAL re same (.2); communications w/ JAL and LHS re same (.2).	13.7	\$405.00	\$5,548.50
3/24/2022	JAL	Review and revise Second Circuit reply brief (8.8); correspondence w/ LHS re record designations and oral argument statement (.3); conferences w/ JAG re revisions to reply brief (.2); confer w/ KCM re same (.1); correspondence w/ K. Benedict re draft reply brief (.2); correspond w/ JAG re oral argument prep (.3).	9.9	\$975.00	\$9,652.50
3/24/2022	KCM	Review/analyze materials and communications re appeals.	0.8	\$1,175.00	\$940.00
3/24/2022	KCM	Teleconference w/ JAL re appeal issue.	0.1	\$1,175.00	\$117.50
3/24/2022	LHS1	Edit reply brief (4.3); research cases for insert re same (2.8); correspond w/ JAL re same (.1); draft oral argument statement (.3); edit revised brief (2.7).	10.2	\$525.00	\$5,355.00
3/24/2022	NRM	Edit reply brief (1.2); correspond w/ JAL, LHS, and JAG re same (.2).	1.4	\$525.00	\$735.00
3/24/2022	JAG	Review, cite check, file and effect service of Second Circuit reply brief (11.6); conferences w/ JAL re same (.2); communications w/ KCM, JPW, JAL, NRM and LHS re same (.3).	12.1	\$405.00	\$4,900.50
3/25/2022	JAL	Review and analyze materials in prep for oral argument (1.5); communications w/ KCM, LHS, and JAG re hearing and next steps (.6).	2.1	\$975.00	\$2,047.50
3/25/2022	GMO	Review Debtors' draft appellate materials (.8); review MSGE appellate materials (1.1); review appellate docket (.3).	2.2	\$465.00	\$1,023.00
3/25/2022	LHS1	Review reply briefs (1.2); review joint appendix (1.8); add citations to joint appendix (.6).	3.6	\$525.00	\$1,890.00
3/25/2022	JAG	Review, revise, file and effect service of Second Circuit filings re oral argument (6.8); communications w/ KCM, JAL and LHS re same (.3).	7.1	\$405.00	\$2,875.50
3/26/2022	LHS1	Incorporate citations from joint appendix to opening brief and review same.	4.9	\$525.00	\$2,572.50
3/27/2022	TEP	Review K. Benedict communication re joint appendix.	0.1	\$915.00	\$91.50
3/27/2022	LHS1	Edit citations to joint appendix.	1.8	\$525.00	\$945.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
3/27/2022	JAG	Review, edit and cite check final briefs re Second Circuit (7.4); communications w/ JAL and LHS re same (.2).	7.6	\$405.00	\$3,078.00
3/28/2022	JAL	Review and revise opening brief and reply brief (2.2); teleconference w/ KCM re developments and next steps (.4); teleconferences w/ LHS re joint appendix and reply brief (.3); review and analyze materials re oral argument prep (3.3).	6.2	\$975.00	\$6,045.00
3/28/2022	KCM	Review/analyze appeal briefs and materials and plan/prepare next steps.	2.7	\$1,175.00	\$3,172.50
3/28/2022	KCM	Teleconference w/ JAL re case status.	0.4	\$1,175.00	\$470.00
3/28/2022	KCM	Teleconference w/ K. Eckstein re appeal issues.	0.4	\$1,175.00	\$470.00
3/28/2022	TEP	Communicate w/ LHS and CG re appeal briefing.	0.1	\$915.00	\$91.50
3/28/2022	LHS1	Review and revise opening and reply briefs (5.8); conferences w/ JAL re same (.3).	6.1	\$525.00	\$3,202.50
3/28/2022	JAG	Review, revise, file and effect service of opening and reply briefs (9.2); communications w/ JAL and LHS re same (.4).	9.6	\$405.00	\$3,888.00
3/29/2022	JAL	Correspond w/ LHS re prep for oral argument (.5); review and analyze materials in prep for oral argument (2.1).	2.6	\$975.00	\$2,535.00
3/29/2022	LHS1	Draft summary of key cases (.9); communicate w/ JAL re same (.3).	1.2	\$525.00	\$630.00
3/29/2022	JAG	Prepare materials re Second Circuit oral argument (15.1); communications w/ LHS re same (.3); communications w/ JAL and LHS re same (.3).	15.7	\$405.00	\$6,358.50
3/30/2022	JAL	Review and analyze materials re oral argument prep.	4.2	\$975.00	\$4,095.00
3/30/2022	JAG	Prepare materials re Second Circuit oral argument (15.3); communications w/ LHS re same (.3).	15.6	\$405.00	\$6,318.00
3/31/2022	JAL	Communications w/ LHS re oral arguments prep (.4); review and analyze materials re same (5.9).	6.3	\$975.00	\$6,142.50
3/31/2022	LHS1	Review and analyze materials re oral argument (4.3); prepare oral argument outline and related prep materials (1.2).	5.5	\$525.00	\$2,887.50
3/31/2022	JAG	Prepare materials re Second Circuit oral argument (8.2); communications w/ LHS re same (.2).	8.4	\$405.00	\$3,402.00
<b>Total</b>			<b>519.10</b>		<b>\$344,334.50</b>
<b>.15 Committee Meetings/Conferences</b>					
3/2/2022	KCM	Plan/prepare for and attend MSGE call.	0.7	\$1,175.00	\$822.50
3/2/2022	TEP	Attend MSGE call (partial).	0.3	\$915.00	\$274.50

## SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
<b>.15 Committee Meetings/Conferences</b>					
3/3/2022	GMO	Research re constituent inquiry (3.7); draft communication to MSGE Group re mediation (.2).	3.9	\$465.00	\$1,813.50
3/28/2022	KCM	Communications w/ GMO re client request.	0.1	\$1,175.00	\$117.50
3/28/2022	GMO	Research re constituent inquiry.	3.4	\$465.00	\$1,581.00
<b>Total</b>			<b>8.40</b>		<b>\$4,609.00</b>
<b>.17 Docket Review &amp; File Maintenance</b>					
3/1/2022	JAG	Review dockets and update pleadings files.	1.6	\$405.00	\$648.00
3/2/2022	JAG	Review dockets and update pleadings files.	1.2	\$405.00	\$486.00
3/7/2022	JAG	Review dockets and update pleadings files.	0.6	\$405.00	\$243.00
3/16/2022	JAG	Review dockets and update pleadings files.	1.2	\$405.00	\$486.00
3/21/2022	JAG	Review dockets and update pleadings files.	1.1	\$405.00	\$445.50
3/28/2022	JAG	Review dockets and update pleadings files.	2.6	\$405.00	\$1,053.00
<b>Total</b>			<b>8.30</b>		<b>\$3,361.50</b>
Total Professional Services			550.7		\$359,584.50

## PERSON RECAP

Person		Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	Member	133.0	\$975.00	\$129,675.00
KCM	Kevin C. Maclay	Member	48.5	\$1,175.00	\$56,987.50
TEP	Todd E. Phillips	Member	4.5	\$915.00	\$4,117.50
JPW	James P. Wehner	Member	2.7	\$975.00	\$2,632.50
ANK	Allegra N. Kauffman	Associate	41.8	\$425.00	\$17,765.00
NRM	Nathaniel R. Miller	Associate	2.0	\$525.00	\$1,050.00
GMO	George M. O'Connor	Associate	56.1	\$465.00	\$26,086.50
LHS1	Lucas H. Self	Associate	126.0	\$525.00	\$66,150.00
JAG	Jessica A. Giglio	Paralegal	126.3	\$405.00	\$51,151.50
CG	Cecilia Guerrero	Paralegal	9.8	\$405.00	\$3,969.00

## DISBURSEMENTS

Date	Description of Disbursements	Amount
03/01/2022	Database Research - Westlaw - LHS1 - 02/01-02/24/2022 [.11]	\$3,877.47
03/01/2022	Database Research - Westlaw - JAG - 02/07-02/11/2022 [.11]	\$138.51
03/01/2022	Database Research - Westlaw - JAL - 02/01-02/11/2022 [.11]	\$98.65

**DISBURSEMENTS**

<b>Date</b>	<b>Description of Disbursements</b>	<b>Amount</b>
03/01/2022	Database Research - Lexis - LHS1 - 02/06/2022 [.11]	\$47.34
03/01/2022	Database Research - Lexis - JAL - 02/01/2022 [.11]	\$283.99
03/07/2022	Outside Duplication Service - JAL Second Circuit reply preparation. [.11]	\$220.40
03/08/2022	Outside Duplication Service - JAL Second Circuit reply preparation. [.11]	\$90.99
03/17/2022	Court Reporting/Transcript Service - Hr'g transcript 3/10/2022 [.11]	\$207.60
03/23/2022	FEDERAL EXPRESS - Express Mail- JAL Mar 18 [.11]	\$49.63
03/29/2022	Court Reporting/Transcript Service - Hr'g transcript 3/23/2022 [.11]	\$48.00
	Total Disbursements	\$5,062.58
	Total Services	\$359,584.50
	Total Disbursements	\$5,062.58
	Total Current Charges	\$364,647.08

# **TASK RECAP**

## **Services**

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.04	2.80	\$1,206.00
.07	12.10	\$6,073.50
.11	519.10	\$344,334.50
.15	8.40	\$4,609.00
.17	8.30	\$3,361.50
	<u>550.70</u>	<u>\$359,584.50</u>

## **Disbursements**

<u>Category</u>	<u>Amount</u>
.11	\$5,062.58
	<u>\$5,062.58</u>

# **BREAKDOWN BY PERSON**

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LHS1 Lucas H. Self	.04	0.60	\$525.00	\$315.00
JAG Jessica A. Giglio	.04	2.20	\$405.00	\$891.00
TEP Todd E. Phillips	.07	2.30	\$915.00	\$2,104.50
CG Cecilia Guerrero	.07	9.80	\$405.00	\$3,969.00
JAL Jeffrey A. Liesemer	.11	133.00	\$975.00	\$129,675.00
KCM Kevin C. Maclay	.11	47.70	\$1,175.00	\$56,047.50
TEP Todd E. Phillips	.11	1.90	\$915.00	\$1,738.50
JPW James P. Wehner	.11	2.70	\$975.00	\$2,632.50
ANK Allegra N. Kauffman	.11	41.80	\$425.00	\$17,765.00
NRM Nathaniel R. Miller	.11	2.00	\$525.00	\$1,050.00
GMO George M. O'Connor	.11	48.80	\$465.00	\$22,692.00
LHS1 Lucas H. Self	.11	125.40	\$525.00	\$65,835.00
JAG Jessica A. Giglio	.11	115.80	\$405.00	\$46,899.00
KCM Kevin C. Maclay	.15	0.80	\$1,175.00	\$940.00
TEP Todd E. Phillips	.15	0.30	\$915.00	\$274.50
GMO George M. O'Connor	.15	7.30	\$465.00	\$3,394.50
JAG Jessica A. Giglio	.17	8.30	\$405.00	\$3,361.50
		<u>550.70</u>		<u>\$359,584.50</u>